

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,**

CIVIL ACTION No. 12-cv-15062

Plaintiff,

v.

HON. THOMAS L. LUDINGTON

**JOEL I. WILSON, DIVERSIFIED
GROUP PARTNERSHIP MANAGEMENT,
LLC, and AMERICAN REALTY FUNDS
CORPORATION,**

Defendants.

**MOTION FOR ENTRY OF CONSENT JUDGMENTS AGAINST DEFENDANTS
DIVERSIFIED GROUP PARTNERSHIP MANAGEMENT, LLC AND AMERICAN
REALTY FUNDS CORPORATION AND BRIEF IN SUPPORT**

Plaintiff, the United States Securities and Exchange Commission (“SEC”), with the consent of Defendants Diversified Group Partnership Management, LLC and American Realty Funds Corporation (the “Defendants”), hereby moves the Court to enter proposed Final Judgments by Consent (the “Proposed Judgments”). Consents executed by the Receiver on behalf of the Defendants, in which the Receiver agrees to the terms of the Proposed Judgments, are being filed simultaneously herewith. Copies of the Proposed Judgments are being submitted to the Court simultaneously herewith and also, for the Court’s convenience, are attached hereto as Exhibits 1 and 2.

The SEC and the Receiver, on behalf of the Defendants, have agreed to terms which will fully resolve the SEC’s claims against the Defendants. The proposed judgments impose disgorgement and prejudgment interest amounts against each of the Defendants and

provide that those monetary awards are deemed satisfied by the amounts collected by the Receiver. The proposed judgments do not impose permanent injunctions or civil penalties against the Defendants in light of their current legal and financial status. The proposed judgments against the Defendants are written to leave Joel Wilson liable for any uncollected amounts due under the earlier judgment entered against him. Entry of the proposed judgments would serve the interests of justice by ending the litigation of the case. The only remaining activity would be the work necessary to conclude the receivership.

Dated: September 18, 2019

Respectfully submitted,

/s/John E. Birkenheier

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HON. THOMAS L. LUDINGTON

**JOEL I. WILSON, DIVERSIFIED
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Defendants.

**BRIEF IN SUPPORT OF
MOTION FOR ENTRY OF CONSENT JUDGMENTS AGAINST DEFENDANTS
DIVERSIFIED GROUP PARTNERSHIP MANAGEMENT, LLC AND AMERICAN
REALTY FUNDS CORPORATION**

The SEC hereby files this Brief in Support of its Motion for Entry of Consent Judgments against Defendants Diversified Group Partnership Management, LLC and American Realty Funds Corporation. For the reasons cited in the Motion, the Court should enter the Proposed Judgments in the form attached hereto as Exhibits 1 and 2.

Dated: September 18, 2019

Respectfully submitted,

/s/John E. Birkenheier
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CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2019 I filed the foregoing Motion to Enter Consent Judgments and Brief in Support with the Clerk of the Court using the CM/ECF system, which sends notification of this filing to all counsel of record.

Respectfully submitted,

/s/John E. Birkenheier
John E. Birkenheier